

EXHIBIT 1

Nash, Martha M.

From: Barrett, Michelle R.
Sent: Tuesday, October 02, 2007 4:28 PM
To: 'Schwartz, Bryan'
Cc: Yee, Rosie
Subject: Letter re Excel Spreadsheets and 2 Excel Spreadsheets

Attachments: Document.pdf; Produced Oct 2 - Sr Retail Mtge Lend Consult 050704-pres.zip; Produced Oct 2 - Retail Mtge Lend Consult 050704-pres.zip

Bryan,

Attached please find a letter regarding the attached Excel spreadsheets, as well as the Excel spreadsheets for putative class members in the Senior Retail Mortgage Lending Consultant and Retail Mortgage Lending Consultant positions.

Michelle

Michelle R. Barrett
Littler Mendelson, P.C.
650 California Street, 20th Floor
San Francisco, California 94108
415.433.1940 general
415.677.4089 direct telephone
415.743.6618 direct facsimile
mbarrett@littler.com
Assistant: Rosie T. Yee, ext. 5016364



Document.pdf (106 KB) Produced Oct 2 - Sr Retail Mt... Produced Oct 2 - Retail Mtge ...



October 2, 2007

Michelle R. Barrett
Direct: 415.677.4089
Direct Fax: 415.743.6618

VIA ELECTRONIC MAIL

Bryan J. Schwartz, Esq.
Nichols Kaster & Anderson, LLP
One Embarcadero Center, Suite 720
San Francisco, CA 94111

Re: **Philip Wong, et al. v. HSBC Mortgage Corp., et al.**
USDC Action No. C 07-2446 MMC
*Defendant HSBC Mortgage Corporation's Production of Documents, Excel
Spreadsheets for Putative Class Members in Senior Retail Mortgage Lending
Consultant and Retail Mortgage Lending Consultant Positions from
May 7, 2004 to Present*

Dear Mr. Schwartz:

Attached to this electronic mail transmission please find two Excel spreadsheets containing requested information for putative class members in the Senior Retail Mortgage Lending Consultant and Retail Mortgage Lending Consultant positions from May 7, 2004 to present. As you are aware, HSBC Mortgage Corporation is producing this information subject to the parties' Stipulated Protective Order.

As you will see, the spreadsheets contain multiple entries for individuals. For example, in the spreadsheet pertaining to Retail Mortgage Lending Consultants, Nelson L. Rivet is listed three times. This does not mean that HSBC Mortgage Corporation employed three different Nelson L. Rivets. Rather, this listing reflects changes to Mr. Rivet's employment. For example, Mr. Rivet's department changed from "NYC/Asian Market Admin" to "Manhattan team 2." Other examples of changes to employment might also include, but is not necessarily limited to, changes in pay, a gap in service, or a change in the employee's location address.

Please also note that the Retail Mortgage Lending Consultant spreadsheet and the Senior Retail Mortgage Lending Consultant spreadsheet contain duplicate entries for some employees. For example, Philip Wong, a named Plaintiff in this matter, started with Mortgage Corporation as a Senior Retail Mortgage Lending Consultant on December 5, 2005. Thereafter, on November 20, 2006, his title changed to Retail Mortgage Lending Consultant. Thus, you will find Mr. Wong listed in both spreadsheets multiple times.

Bryan J. Schwartz, Esq.
Re: HSBC/Wong
Page 2

The Excel spreadsheets contain the following fields:

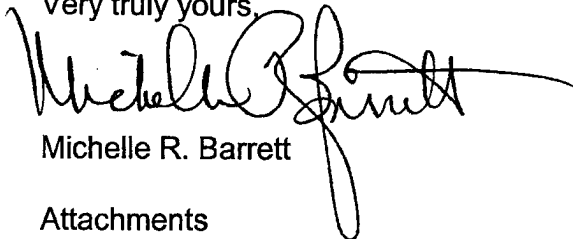
<u>Name:</u>	Employee name
<u>ID:</u>	Employee identification number
<u>Job Title:</u>	Job title held by employee
<u>Dept:</u>	Market or location to which employee is assigned
<u>Entry Date:</u>	Date employee entered the particular job title
<u>Dept Date:</u>	Date employee entered into the department
<u>Service Dt:</u>	Date that would denote either original hire date or any gaps in employee service (e.g. employee is hired 1/1/06, leaves 5/1/06 and then returns to company 7/1/06; Service Dt should read 7/1/06)
<u>Term Date:</u>	Date employee's employment terminated
<u>Location:</u>	Shorthand code used internally to note employee's department
<u>Address 1:</u>	(First Address listed in spreadsheet.) Physical address of the location/department
<u>City:</u>	(First City listed in spreadsheet.) City of the location/department
<u>State:</u>	(First State listed in spreadsheet.) State of location/department
<u>Postal:</u>	(First Postal listed in spreadsheet.) Zip code for location/department.
<u>Address 1:</u>	(Second Address listed in spreadsheet.) Last known home address for employee.
<u>Address 2:</u>	Any additional last known address information for employee, such as Post Office Box.
<u>City:</u>	(Second City listed in spreadsheet.) Last known city for employee's home address.
<u>State:</u>	(Second State listed in spreadsheet.) Last known state for employee's home address.
<u>Postal:</u>	(Second Postal listed in spreadsheet.) Last known zip code for employee's home address.

Bryan J. Schwartz, Esq.
Re: HSBC/Wong
Page 3

This information should assist in your review of the spreadsheets. Please also note that we are working to determine if we can also provide last known telephone numbers and the last four digits of Social Security Numbers for individuals.

If you have questions regarding these spreadsheets, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michelle R. Barrett", with a long, sweeping horizontal line extending to the right.

Michelle R. Barrett

Attachments

Firmwide:83191794.1 023404.1043